IN THE DRAWINGS:

Please replace the attached Replacement Sheet for its corresponding drawing sheet in the present Application.

REMARKS

Applicant appreciates the time taken by the Examiner to review Applicant's present application. This application has been carefully reviewed in light of the Official Action mailed October 4, 2006. Applicant respectfully requests reconsideration and favorable action in this case.

Claim Status

Claims 1-23 were pending. Claims 1-23 were rejected. Claims 1, 12 and 23 are amended herein. Claims 24-26 are new. No new matter has been added. Thus, Claims 1-26 are now pending.

Rejections under 35 U.S.C. § 102

Claims 1-3, 8-14 and 19-22 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Publication No. 2006/0167927 ("Edelstein").

Claim 1 recites:

> A method for searching an applied data model, comprising:
>
> translating a query to a set of statements operable to search the applied data model to an arbitrary level wherein the applied data model comprises at least one component and an associated relationship and the query is a component query or a relationship query;
>
> searching the applied data model to the arbitrary level based on the set of statements;
>
> producing a set of replies to the set of statements wherein the set of replies includes at least one component or one relationship at the arbitrary level; and
>
> processing the set of replies based on the query.

Claim 12 recites similar limitations. Thus embodiments of the present invention teach searching an applied data model by translating a query into a set of statements which, taken together, search the applied data model to an arbitrary level. (*See* Specification, paragraphs 0105, 0107 and 0108.) Furthermore, the applied data model can be searched based on a component query or a relationship query. That is, the search may search the applied data model based on components or relationships and may retrieve a set of components or relationships which

includes at least one component or one relationship at the arbitrary level. (*See* Specification, paragraphs 0095 and 0096.)

In contrast, Edelstein teaches converting "a query expressed in an ontology query language" into one or more database queries for one or more corresponding databases. (*See* Edelstein, paragraphs 0053 and 0064 and figure 2.) Thus the thrust of the invention of Edelstein seems to be to convert an ontology query into a set of database queries for different databases such that one ontology query can be used to search multiple databases.

As can be seen above, the focus and results of the two inventions are very different: the present invention generates a set of statements which, taken together, search an applied data model to an arbitrary level whereas Edelstein teaches converting a query into database queries for different databases such that multiple databases can be searched using one ontology query. This difference is buttressed by Edelstein's purpose of enabling querying for "distributed computing." (*See* Edelstein, paragraph 0053.) That is, Edelstein appears to teach that data is stored across multiple data sources and different querying languages are used to query different data sources because the data stored across the data sources cannot be queried using one common query language. Edelstein teaches remedying this problem with a query conversion tool which converts a query expressed in an ontology query language into a set of equivalent queries in the different query languages, allowing a user to enter one query which in turn is used to generate a set of equivalent queries in the different query languages such that databases can be queried by a user inputting one query command. (*See* Edelstein, paragraphs 0015 and 0049.) Edelstein is not concerned with searching a database to an arbitrary level and does not disclose translating a query into a set of statements which search an applied data model to an arbitrary level. Therefore, Applicant respectfully submits that Edelstein does not teach searching an applied data model to an arbitrary level.

Furthermore, the present invention teaches searching an applied data model based on a component query or a relationship query: this querying flexibility enables more powerful searches. Applicant respectfully submits that the cited portions of Edelstein do not teach searching an applied data model based on a component query or a relationship query. If the Examiner disagrees, the Applicant respectfully requests the Examiner to point out where Edelstein teaches both a component query and a relationship query. Similarly, as Edelstein does not teach a component query or a relationship query, Edelstein also does not teach producing a set of replies wherein the set of replies includes at least one component or one relationship.

Applicant respectfully submits that at least because Edelstein does not teach translating a query into a set of statements which search an applied data model to an arbitrary level and searching based on a component query or a relationship query, Claims 1, 12 and the respective dependant claims are not anticipated by Edelstein. Accordingly, withdrawal of this rejection is respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 4, 5,15,16 and 23 were rejected under 35 U.S.C. §103(a) as being unpatentable over Edelstein and U.S. Publication No. 2004/0002818 ("Kulp"),

Claims 6,7,17 and 18 were rejected under 35 U.S.C. §103(a) as being unpatentable over Edelstein and Kulp, and further in view of U.S. Patent No. 6,509,898 ("Chi").

Claim 23 was rejected under 35 U.S.C. §103(a). Claim 23 recites limitations similar to those of Claim 1. Applicant respectfully submits that for reasons similar to those set forth above, Claim 23 is novel in light of Edelstein. Applicant further submits that the cited portions of Kulp and Chi do not remedy the deficiencies of Edelstein. Accordingly, withdrawal of this rejection of Claim 23 is respectfully requested.

Dependant Claims 4-7 and 15-18 were rejected under 35 U.S.C. §103(a). Because Claims 4-7 and 15-18 depend from the independent Claims discussed above, for at least the reasons discussed above, Claims 4-7 and 15-18 are submitted to be patentable over the cited prior art. Accordingly, withdrawal of this rejection is respectfully requested.

New Claims

Claims 24-26 are new. Claims 24-26 recite "wherein the query specifies the arbitrary level." Thus Claims 24-26 teach a query wherein the number of levels a query traverses will not exceed a specified level. Applicant respectfully submits that Edelstein does not teach such a query. Applicant further submits that the cited portions of Kulp and Chi do not teach such a query. According, Applicant respectfully submits that Claims 24-26 are novel.

CONCLUSION

Applicant respectfully requests that the Examiner withdraw his rejections of Claims 1, 12 and 23 and the respective dependant claims. Applicant has now made an earnest attempt to place this case in condition for allowance. Other than as explicitly set forth above, this reply does not include an acquiescence to statements, assertions, assumptions, conclusions, or any combination thereof in the Office Action. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests full allowance of Claims 1-26. The Examiner is invited to telephone the undersigned at the number listed below for prompt action in the event any issues remain.

An extension of one (1) month is requested and a Notification of Extension of Time Under 37 C.F.R. § 1.136 with the appropriate fee is enclosed herewith.

The Director of the U.S. Patent and Trademark Office is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 50-3183 of Sprinkle IP Law Group.

Respectfully submitted,

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Date: February 5, 2007

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